

September 11, 2001

The Honorable Michael K. Powell  
Chairman  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Enhanced 911 Calling Systems  
CC Docket No. 94-102

Dear Chairman Powell:

AARP appreciates having the opportunity to comment on an issue before the Federal Communications Commission (FCC) that is of great interest and concern to us. The FCC has implemented rules concerning emergency calls over wireless phones (E911 Phase II rules) that require commercial mobile radio service providers to be able to identify a 911 caller's location within certain accuracy specifications by October 1, 2001. We support this requirement which we believe will enable millions of mid-life and older Americans to more easily access emergency services during critical situations when time is of the essence. However, most of the major wireless carriers have requested waivers of the E911 implementation requirements, placing the viability of this important program in jeopardy. AARP encourages the Commission to promptly implement and enforce its E911 rules.

Many senior citizens purchased cellular phones primarily for emergency use, and only infrequently use these phones for other purposes. The ability of public safety response centers to rapidly respond to emergency calls is severely handicapped by inadequate knowledge of the location of the caller. Technology has now advanced to the point that this weakness in the safety aspects of wireless service can be reduced. However, the proposed waivers currently before the Commission request that the FCC delay implementation and enforcement of its E911 Phase II rules for wireless services. Carriers have had ample opportunity to examine the technical challenges associated with E911 implementation, and they are aware that solutions currently exist to locate callers placing emergency calls on their mobile phones. Allowing significant and protracted delays to the FCC's previously announced E911 Phase II deadline would harm those who would most benefit from the E911 service.

Additionally, the major wireless carriers have filed waiver applications at the Commission, seeking delay of the implementation schedule or relaxation of the accuracy standard. A

relaxation of the accuracy standard could significantly affect the time required for emergency service responsiveness, which in many instances may be the difference between life and death. Moreover, many of the waiver filings have proposed schedules that will not accommodate "legacy telephones" -- that operate on an analog signal -- for at least another five years. There are approximately 41 million analog wireless phones currently in use, and older Americans use many of these. E911 implementation plans proposed in the waiver requests hinge on the replacement of these outmoded phones; however, many older users are simply not interested in changing phones due to, among other things, the inconvenience or additional cost involved in upgrading to the latest technology.

While AARP does not endorse or advocate a particular approach or technology that should be used to deploy E911 services, we understand that solutions are currently available that meet the FCC's E911 accuracy standards and can accommodate legacy phones now. Therefore, we urge the Commission to adhere to the FCC's previously announced implementation deadlines, and require that carriers immediately move forward to protect the public by complying with the E911 rules.

Thank you for your attention to this matter, which is of great importance not only to our members, but to the general public as well.

Sincerely,

Martin A. Corry  
Director  
Federal Affairs